

# **EXHIBIT B**



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Via Email

September 4, 2024

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Re: *BCB Cheyenne LLC v. MineOne et. al.*; Civil No. 23-CV-79-ABJ  
**Deposition Scheduling**

Dear Counsel:

As you know, we represent Defendants MineOne Wyoming Data Center LLC, MineOne Partners LLC, and Terra Crypto Inc. (collectively, the "MineOne Defendants"). We write pursuant to Judge Hambrick's September 3, 2024 directive to provide a list of individuals that the MineOne Defendants intend to depose:

1. Bryce Fincham (BCB is the party that we believe controls this witness)
2. Barney Patsel & Todd Edwards (by subpoena)<sup>1</sup>
3. James Quid (BCB) / CMV Global & Bayview Capital (BCB) (if necessary, after deposing Messrs. Fincham, Patsel, and Edwards)
4. Neil Phippen (BCB)
5. Emory Patterson (BCB)

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<sup>1</sup> The MineOne Defendants plan to sequence the depositions with Mr. Fincham's deposition first and if Messrs. Edwards' and Patsel's deposition testimony would seem duplicative of Fincham's deposition, the MineOne Defendants will withdraw their subpoenas to Messrs. Edwards and Patsel.

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6. Steven Randall (BCB)
7. Sean Murphy (BCB)
8. Tony Simpson (by subpoena)
9. Mark Aldrich / Shermco (by subpoena)
10. Lee Filer (by subpoena)
11. Joey Darwell / Cryptonite LLC (by subpoena)
12. Leo Wolfson (by subpoena)
13. Tyler Lindholm (by subpoena)
14. Michael Murphy (BCB)

The MineOne Defendants reserve all rights and waive none.

Regards,

A handwritten signature in blue ink, appearing to read "Paula K. Colbath".

Paula K. Colbath  
Partner

cc: All Counsel (via Email)

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